# Iowa Department of Natural Resources Final Title V Operating Permit

Name of Permitted Facility: John Deere Ottumwa Works Facility Location: 928 East Vine Street, Ottumwa, IA 52501

Air Quality Operating Permit Number: 03-TV-028

**Expiration Date: 9/8/2008** 

**EIQ Number: 92-1316** 

Facility File Number: 90-01-003

# **Responsible Official**

Name: Randy Sergesketter Title: General Manager

Mailing Address: 928 East Vine Street, Ottumwa, IA 52501

Phone #: (641) 682-2286

# **Permit Contact Person for the Facility**

Name: Fred Tindall

**Title: Environmental Manager** 

Mailing Address: 928 East Vine Street, Ottumwa, IA 52501

Phone #: (641) 683-2712

This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit.

#### For the Director of the Department of Natural Resources

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Douglas A. Campbell, Supervisor of Air Operating Permits Section

Date

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# **Abbreviations**

acfm	. actual cubic feet per minute
	. Code of Federal Regulation
	=
°F	<del>-</del>
	. emissions inventory questionnaire
ft <sup>3</sup> /hr	. cubic feet per hour
gal/hr	. gallons per hour
gr./dscf	grains per dry standard cubic foot
	grains per one hundred cubic feet
ĬAC	. Iowa Administrative Code
	. Iowa Department of Natural Resources
MDI	. 4,4-Methylenediphenyl diisocyanate
MVAC	. motor vehicle air conditioner
NA	. Not Applicable
NSPS	. new source performance standard
ppmv	. parts per million by volume
lb./hr	. pounds per hour
lb./MMBtu	pounds per million British thermal units
	Prevention of Significant Deterioration
	standard cubic feet per minute
	Standard Industrial Classification
TPY	
	. United States Environmental Protection Agency
COLITI	. Cinica States Environmental Protection rigories
<b>Pollutants</b>	
PM	norticulate metter
	particulate matter ten microns or less in diameter
SO <sub>2</sub>	
NO <sub>x</sub>	. nitrogen oxides

VOC ......volatile organic compound

CO ...... carbon monoxide HAP ...... hazardous air pollutant

# I. Facility Description and Equipment List

Facility Name: John Deere Ottumwa Works Permit Number: 03-TV-028

Facility Description: Manufacture of Farm Machinery and Equipment (SIC 3523)

# **Equipment List**

<b>Emission Point</b>	<b>Associated Emission</b>	<b>Associated Emission Unit Description</b>		
Number	Unit Number(s)	•		
RIM MOLD/WAX 1	RIM MOLD/WAX 1	RIM Mold/Wax 1		
RIM MOLD/WAX 2	RIM MOLD/WAX 2	RIM MoldWax 2		
RIM OVEN 1	RIM OVEN 1	RIM Oven 1		
EPC3PS-3-B	EUC3PSc	RIM Adhesive Booth		
EP RRHA	EU RRHA	RIM Holding Area		
EP SC	EU SC	Storage Cabinet		
C2PSCK	C2PSCK	C2-C10 Paint Kitchen		
CZFSCK	C2PSCK-2	C2-C10 Paint Kitchen		
C7-C9 O1B				
C7-C9 O2B	C7-C9 O1	C7-C9 Oven		
C7-C9 O3B				
EPC7PS-1-B	EUC7PS	C7 Point System Booth		
EPC7PS-2-B	EUCIPS	C7 Paint System Booth		
EPC9PS-1-B	EUC9PS	C9 Paint System Booth		
EPC9PS-2-B	EUC9FS	C9 Paint System Booth		
EPC10PS5-O	EUC10PS5-O	C10 Paint System Oven		
EPC10PS-1B		C10 Paint System Booth		
EPC10PS-2B	EUC10PS			
EPC10PS-3B	EUCIUIS	C10 I ann System Booth		
EPC10PS-4B				
EPC10W	EUC10W	C10 Wash System		
	EUC10D	C10 Wash Oven		
EPC12BO	EUC12BO	C12 Bake Oven		
EPC12PS-1B				
EPC12PS-2B	EUC12PS	C12 Paint System Booth		
EPC12PS-3B	1001213	C12 I dilit bysiciii bootii		
EPC12PS-4B				
EPE2	EUE2 Wash	E2 Wash System		
151 152	EUE2 Oven	E2 Wash Oven		

# **Equipment List (continued)**

<b>Emission Point</b>	<b>Associated Emission</b>	Associated Emission Unit Description			
Number	Unit Number(s)				
EPE3P-1-O					
EPE3P-2-O					
EPE3P-3-O	EUE3PD	E2 Point Din Tonks (2 tonks)			
EPE3P-4-O	EUESPD	E3 Paint Dip Tanks (2 tanks)			
EPE3P-5-O					
EPE3P-6-O					
EPE3PS-1B					
EPE3PS-2B	EUE3PS1	E2 Daint Comey Dooth			
EPE3PS-3B	EUESPSI	E3 Paint Spray Booth			
EPE3PS-4B					
EPE4 Oven	EUE4 Oven	E4 Paint Line Oven			
EPL4PS-1-B	EUL4PS	I 4 Daint System Spray Booth			
EPL4PS-2-B	EULAFS	L4 Paint System Spray Booth			
EP HT	EU HTa	Heat Treat Furnace a			
LI III	EU HTb	Heat Treat Furnace b			
EP D14	EU D14	Draw Furnace Department 14			
EP SC	EU SC	Storage Cabinet			
EPWPR	EUWPR	Production Welding			
EPMA	EUMA	Misc. Adhesive Usage			
EPMPS	EUMPS	Misc. Paint Usage			
EPMSC	EUMSC	Misc. Cleaning			
EPC8EE	EUEEa	Engine Exhaust in C8			
EPL3EE-1	EUEEb	Engine Exhaust in L3			
EPL3EE-2	EUEEc	Engine Exhaust in L3			
EPL4EE-1	EUEEd	Engine Exhaust in L4			
EPL4EE-2	EUEEe	Engine Exhaust in L4			
EPM6EE	EUEEf	Engine Exhaust in M6			
EPTW3S-4	EUTW3S-4	Solvent Tank (D100)			
EPTW3S-1	EUTW3S-1	Solvent Tank (A4206)			
EPTW3S-3	EUTW3S-3	Solvent Tank (A2039)			
EPMG	EUMG	Facility Space Heaters			

# Insignificant Equipment List

<b>Insignificant Emission</b>	Insignificant Emission Unit Description
Unit Number	
EPTC9D	Diesel Fuel Tank (515 gallons)
EUTPWO	Waste Oil Tank (10,000 gallons)
EUTN1D	Diesel Fuel Tank #48 (515 gallons)
EUTM3G	Gasoline Tank (515 gallons)
EUTM3D	Diesel Fuel Tank #8 (515 gallons)
EPC3CT	Cooling Tower C3
EPBCT	Cooling Tower B
EPCCT	Cooling Tower C
EUE2CT	Cooling Tower E2
EUL3CT	Cooling Tower L3
EUPCT	Cooling Tower P
EURCT	Cooling Tower R
EUTC9D	Diesel Tank (515 gallons)
EUTL3D	Diesel Tank (515 gallons)
EUTW3S-2	Diesel Fuel Tank (560 gallons)
EURSB	Shot Blast – Building R

# **II. Plant-Wide Conditions**

Facility Name: John Deere Ottumwa Works

Permit Number: 03-TV-028

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

#### **Permit Duration**

The term of this permit is: Five (5) years from permit issuance.

Commencing on: 09/09/2003

Ending on: 09/08/2008

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

#### **Facility Wide Emission Limits**

*The atmospheric emissions from the facility shall not exceed the following:* 

The facility shall maintain its PSD minor source status for at least a three-year period after October 18, 2002.

Authority for Requirement: Iowa DNR Construction Permits 78-A-080S5, 97-A-629S3,

97-A-630S3, 97A-631S3, 94-A-263S3, 97-A-633S2, 97-A-634S2, 97-A-635S2, 87-A-029S1, 02-A-180, 02-A-181, 81-A-075S1, 02-A-182, 96-A-439S1, 02-A-273, 02-A-274, 02-A-275, 02-A-276, 02-A-277, 02-A-183, 02-A-184, 02-A-549, 02-A-550, 86-A-004S1,

02-A-185, 02-A-151, 02-A-152S1

Pollutant: Hazardous Air Pollutants (HAP's) (Individual)

Emission Limit(s): 9.4 tons per any rolling 12-month period

Authority for Requirement: Iowa DNR Construction Permits 78-A-080S5, 97-A-629S3,

97-A-630S3, 97A-631S3, 94-A-263S3, 97-A-633S2, 97-A-634S2,

97-A-635S2, 87-A-029S1, 02-A-180, 02-A-181, 81-A-075S1, 02-A-182, 96-A-439S1, 02-A-273, 02-A-274, 02-A-275, 02-A-276,

02-A-277, 02-A-183, 02-A-184, 02-A-549, 02-A-550, 86-A-004S1,

02-A-185, 02-A-151, 02-A-152S1

Pollutant: Hazardous Air Pollutants (HAP's) (Total)

Emission Limit(s): 24.4 tons per any rolling 12-month period

Authority for Requirement: Iowa DNR Construction Permits 78-A-080S5, 97-A-629S3,

97-A-630S3, 97A-631S3, 94-A-263S3, 97-A-633S2, 97-A-634S2,

97-A-635S2, 87-A-029S1, 02-A-180, 02-A-181, 81-A-075S1,

02-A-182, 96-A-439S1, 02-A-273, 02-A-274, 02-A-275, 02-A-276, 02-A-277, 02-A-183, 02-A-184, 02-A-549, 02-A-550, 86-A-004S1,

02-A-185, 02-A-151, 02-A-152S1

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#### **Facility Wide Reporting & Record Keeping Requirements**

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

- 1. The individual and total HAP\* content of each coating and solvent used in the facility.
- 2. The monthly emission rate of each individual HAP from the facility\*\*.
- 3. The monthly emission rate of all HAPs from the facility.
- 4. The rolling, 12-month total of each HAP emitted from the facility.
- 5. The rolling, 12-month total of all HAPs emitted from facility.

Authority for Requirement: Iowa DNR Construction Permits 78-A-080S5, 97-A-629S3,

97-A-630S3, 97A-631S3, 94-A-263S3, 97-A-633S2, 97-A-634S2, 97-A-635S2, 87-A-029S1, 02-A-180, 02-A-181, 81-A-075S1, 02-A-182, 96-A-439S1, 02-A-273, 02-A-274, 02-A-275, 02-A-276, 02-A-277, 02-A-183, 02-A-184, 02-A-549, 02-A-550, 86-A-004S1, 02-A-185, 02-A-151, 02-A-152S1

### **Source Emission Limits**

The atmospheric emissions from these sources shall not exceed the following:

Pollutant: Volatile Organic Compounds (VOC's)

Emission Limit(s): The VOC limit is 236 tons per any rolling 12-month period for the following emissions units: C10 spray booth (EU10PS), C12 spray booth (EU12PS), RIM Adhesive Booth (EUC3PSC), C7 spray booth (EUC7PS), C9 spray booth (EUC9PS), E3 dip tank (EUE3PD), E3 spray booth (EUE3PS1), L4 spray booth (EUL4PS), RIM Mold/Wax 1 (EU RIM MOLD/WAX 1), and RIM Mold/Wax 2 (RIM MOLD/WAX 2).

Authority for Requirement: Iowa DNR Construction Permits 78-A-080S5, 97-A-629S3,

97-A-630S3, 97A-631S3, 94-A-263S3, 97-A-633S2, 97-A-634S2, 97-A-635S2, 87-A-029S1, 02-A-180, 02-A-181, 81-A-075S1, 02-A-182, 96-A-439S1, 02-A-273, 02-A-274, 02-A-275, 02-A-276, 02-A-277, 02-A-183, 02-A-184, 02-A-549, 02-A-550, 86-A-004S1, 02-A-185, 02-A-151, 02-A-152S1

<sup>\*</sup> Hazardous Air Pollutant as defined by 112(b) of the Clean Air Act. For a list of HAPs, please refer to Table A that is attached to Form 112(g) which is part of the Air Construction Permit Application or contact the Iowa DNR - Air Quality Bureau.

<sup>\*\*</sup> Includes emissions from all combustion sources, coating lines, adhesive application, resin application, and cleaning solvent. Also includes fugitive HAP emissions.

#### **Source Reporting & Record Keeping Requirements**

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

- A. The permittee shall maintain the following monthly records:
  - 1. The total monthly VOC emission rate from the following emissions units: EU10PS, EU12PS, EUC3PSC, EUC7PS, EUC9PS, EUE3PD, EUE3PS1, EUL4PS, EU RIM MOLD/WAX 1, and RIM MOLD/WAX 2 (tons). This record can be kept as the combined emission rate from these emissions units. If requested by the Iowa DNR Air Quality Bureau, the permittee shall maintain monthly emissions information for each of the emissions units.
  - 2. The rolling, 12-month total of the VOC emission rate from the following emissions units: EU10PS, EU12PS, EUC3PSC, EUC7PS, EUC9PS, EUE3PD, EUE3PS1, EUL4PS, EURIM MOLD/WAX 1, and RIM MOLD/WAX 2 (tons).
- B. If the rolling, 12-month total of the VOC emission rate from emission units EU10PS, EU12PS, EUC3PSC, EUC7PS, EUC9PS, EUE3PD, EUE3PS1, EUL4PS EU RIM MOLD/WAX 1, and RIM MOLD/WAX 2 exceeds 212 tons per year, the permittee shall maintain the following daily records:
  - 1. The total daily VOC emission rate from the following emissions units: EU10PS, EU12PS, EUC3PSC, EUC7PS, EUC9PS, EUE3PD, EUE3PS1, EUL4PS EU RIM MOLD/WAX 1, and RIM MOLD/WAX 2 (tons).
  - 2. Beginning with the first day after the total emission rate exceeds 212 tons per year, the rolling, 365-day total of the VOC emission rate from the following emissions units: EU10PS, EU12PS, EUC3PSC, EUC7PS, EUC9PS, EUE3PD, EUE3PS1, EUL4PS, EURIM MOLD/WAX 1, and RIM MOLD/WAX 2 (tons).
  - 3. The permittee may return to the monthly recordkeeping required above when the rolling 365-day total of VOC emissions from emissions units EU10PS, EU12PS, EUC3PSC, EUC7PS, EUC9PS, EUE3PD, EUE3PS1, EUL4PS, EU RIM MOLD/WAX 1, and RIM MOLD/WAX 2 effect beginning with the first calendar month after the day on which VOC emissions from these units are less than 212 tons.
- C. The permittee shall submit deviation reports that identify all exceedances of the rolling 12-month emission limitations for VOC and HAPs. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.

Authority for Requirement: Iowa DNR Construction Permits 78-A-080S5, 97-A-629S3, 97-A-630S3, 97A-631S3, 94-A-263S3, 97-A-633S2, 97-A-634S2, 97-A-635S2, 87-A-029S1, 02-A-180, 02-A-181, 81-A-075S1, 02-A-182, 96-A-439S1, 02-A-273, 02-A-274, 02-A-275, 02-A-276, 02-A-277, 02-A-183, 02-A-184, 02-A-549, 02-A-550, 86-A-004S1, 02-A-185, 02-A-151, 02-A-152S1

#### **Emission Limits**

Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:

Opacity (visible emissions): 40% opacity

Authority for Requirement: 567 IAC 23.3(2)"d"

Sulfur Dioxide (SO<sub>2</sub>): 500 parts per million by volume

Authority for Requirement: 567 IAC 23.3(3)"e"

# <u>Particulate Matter (state enforceable only)</u><sup>1</sup>:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B). Authority for Requirement: 567 IAC 23.3(2)"a" (as revised 7/21/1999)

# Particulate Matter (federally enforceable)<sup>2</sup>:

The emission of particulate matter from any process shall not exceed the amount determined from Table I, except as provided in 567 — 21.2(455B), 23.1(455B), 23.4(455B) and 567 — Chapter 24. If the director determines that a process complying with the emission rates specified in Table I is causing or will cause air pollution in a specific area of the state, an emission standard of 0.1 grain per standard cubic foot of exhaust gas may be imposed. Authority for Requirement: 567 IAC 23.3(2)"a" (prior to 7/21/1999)

<u>Fugitive Dust:</u> Attainment and Unclassified Areas - No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement

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This is the current language in the Iowa Administrative Code (IAC). This version of the rule is awaiting EPA approval to become part of Iowa's State Implementation Plan (SIP). When EPA approves this rule, it will replace the older version and will be considered federally enforceable.

<sup>&</sup>lt;sup>2</sup> This is the current language in the Iowa SIP, and is enforceable by EPA.

pursuant to this subrule. Reasonable precautions may include, but not limited to, the following procedures.

- 1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
- 2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
- 3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizers or limestone.
- 4. Covering at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
- 5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.

Authority for Requirement: 567 IAC 23.3(2)"c"

# **Compliance Plan**

The owner/operator shall comply with the applicable requirements listed below. The compliance status is based on information provided by the applicant.

Unless otherwise noted in Section III of this permit, John Deere Ottumwa Works is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which become effective during the permit term, John Deere Ottumwa Works shall comply with such requirements in a timely manner. Authority for Requirement: 567 IAC 22.108(15)

# **III. Emission Point-Specific Conditions**

Facility Name: John Deere Ottumwa Works

Permit Number: 03-TV-028

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# Emission Point ID Numbers: RIM MOLD/WAX 1, RIM MOLD/WAX 2

### **Associated Equipment**

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
RIM MOLD/WAX 1	RIM MOLD/WAX 1	RIM Mold/Wax 1	CE RIM M.1: Mat Filter	Prepolymer & Polyol, Wax	83.5 gal/hr 0.45 gal/hr	02-A-151S1
RIM MOLD/WAX 2	RIM MOLD/WAX 2	RIM Mold/Wax 2	CE RIM M.2: Mat Filter	Prepolymer & Polyol, Wax	83.5 gal/hr 0.45 gal/hr	02-A-152S2

# **Applicable Requirements**

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40 %<sup>(1)</sup>

Authority for Requirement: Iowa DNR Construction Permits 02-A-151S1, 02-A-152S2

567 IAC 23.3(2)"d"

(1) Per DNR Air Quality Policy 3-b-08, <u>Opacity Limits</u>, an exceedence of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 0.81 lb/hr

Authority for Requirement: Iowa DNR Construction Permits 02-A-151S1, 02-A-152S2

Pollutant: Particulate Matter Emission Limit(s): 0.01 gr/scf

Authority for Requirement: Iowa DNR Construction Permits 02-A-151S1, 02-A-152S2

567 IAC 23.4(13)

Pollutant: Volatile Organic Compounds (VOC's)

Emission Limit(s): See "Source Emission Limits" (page 8)

Authority for Requirement: Iowa DNR Construction Permits 02-A-151S1, 02-A-152S2

Pollutant: 4,4-Methylenediphenyl diisocyanate (MDI) Emission Limit(s): 0.5 tons/any rolling 12-month period

Authority for Requirement: Iowa DNR Construction Permits 02-A-151S1, 02-A-152S2

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: Iowa DNR Construction Permits 02-A-151S1, 02-A-152S2

# **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Process throughput:

- 1. The maximum amount of each of the two polyurethane foam components (i.e. prepolymer and polyol) used in RIM Mold/Wax 1 and RIM Mold/Wax 2 shall not exceed 150,000 pounds in any rolling 12-month period.
- 2. Only one spray gun shall be operated to apply wax in RIM Mold/Wax 1 and Rim Mold/Wax 2.

#### Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

- A. The permittee shall maintain the following monthly records:
  - 1. The identification, the VOC content (percent by weight) and the amount (pounds) of each material used in the RIM operation. This shall include the polyurethane foam components and wax.
  - 2. See "Source Reporting & Record Keeping Requirements" (page 9)
  - 3. The individual and total HAP content of each material used in the RIM operation.
  - 4. The monthly emission rate of MDI and total HAPs from the RIM operation (pounds or tons).
  - 5. See "Facility Wide Reporting & Record Keeping Requirements" (page 8)
- B. If the rolling, 12-month total of the VOC emission rate from emission units EU10PS, EU12PS, EUC3PSC, EUC7PS, EUC9PS, EUE3PD, EUE3PS1, EUL4PS, EU RIM MOLD/WAX 1, and RIM MOLD/WAX 2 exceeds 212 tons per year, the permittee shall maintain the following daily records:
  - 1. The identification, the VOC content and the amount (gallons) of each material used in the RIM operation.
  - 2. See "Source Reporting & Record Keeping Requirements" (page 9)
- C. The permittee shall submit deviation reports that identify all exceedances of the rolling 12-month emission limitations for VOC and HAPs. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.

Authority for Requirement: Iowa DNR Construction Permits 02-A-151S1, 02-A-152S2

Emission Point Characteristics
Each emission point shall conform to the specifications listed below.
Stack Height (feet): 20 Stack Diameter (inches): 24 Stack Exhaust Flow Rate (scfm): 9,500 Stack Temperature (°F): 70 Vertical, Unobstructed Discharge Required: Yes No \( \subseteq \) Authority for Requirement: Iowa DNR Construction Permits 02-A-151, 02-A-152S1
The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.
Periodic Monitoring Requirements
The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.
Agency Approved Operation & Maintenance Plan Required? Yes 🖂 No 🗌
<ul> <li>Weekly</li> <li>Inspect the filter system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.</li> <li>Maintain a written record of the observation and any action resulting from the inspection.</li> </ul>
Record Keeping and Reporting  Maintenance and inspection records will be kept for five years and available upon request.
<ul> <li>Quality Control</li> <li>The filter equipment will be operated and maintained according to the manufacturers recommendations.</li> </ul>
Facility Maintained Operation & Maintenance Plan Required? Yes \( \subseteq \) No \( \subseteq \)

Authority for Requirement: 567 IAC 22.108(3)"b"

#### **Emission Point ID Number: RIM OVEN 1**

#### <u>Associated Equipment</u>

EU	EU	Control	Raw	Rated
	Description	Equipment	Material	Capacity
RIM OVEN1	RIM Oven 1	NA	Natural Gas	0.8 MMBtu/hr

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### **Applicable Requirements**

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40 %<sup>(1)</sup>

Authority for Requirement: Iowa DNR Construction Permit 02-A-149

567 IAC 23.3(2)"d"

(1) Per DNR Air Quality Policy 3-b-08, <u>Opacity Limits</u>, an exceedence of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 0.01 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 02-A-149

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/scf

Authority for Requirement: Iowa DNR Construction Permit 02-A-149

567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv

Authority for Requirement: Iowa DNR Construction Permit 02-A-149

567 IAC 23.3(3)"e"

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Process throughput:

1. The oven shall be fired by natural gas or liquefied petroleum gas only. The total heat input to the oven is 0.8 MMBTU/hr.

Authority for Requirement: Iowa DNR Construction Permit 02-A-149

### Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

1. See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

Authority for Requirement: See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

#### **Emission Point Characteristics**

Stack Height (feet): 19

The emission point shall conform to the specifications listed below.

Stack Diameter (inches): 10
Stack Exhaust Flow Rate (scfm): 2,300
Stack Temperature (°F): 250
Vertical, Obstructed Discharge Required: Yes No No
Authority for Requirement: Iowa DNR Construction Permit 02-A-149
The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.
Periodic Monitoring Requirements
The owner/operator of this equipment shall comply with the periodic monitoring requirements
listed below.
Agency Approved Operation & Maintenance Plan Required? Yes  No
Facility Maintained Operation & Maintenance Plan Required? Yes  No
Authority for Requirement: 567 IAC 22.108(3)"b"

# Emission Point ID Numbers: EPC3PS-3-B, EP RRHA, EP SC

# **Associated Equipment**

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EPC3PS-3-B	EUC3PSc	RIM Adhesive Booth	CEC3PSWa: Mat Filter	Adhesive	6.09 gal/hr	87-A-029S1
EP RRHA	EU RRHA	RIM Holding Area	NA	Rims	NA	02-A-148
EP SC	EU SC	Storage Cabinet	NA	Adhesives/ Solvents	NA	02-A-272

# **Applicable Requirements**

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from EPC3PS-3-B shall not exceed the levels specified below (all VOC and HAP emissions for EP RRHA and EP SC are accounted for through EPC3PS-3-B).

Pollutant: Opacity

Emission Limit(s): 40 %<sup>(1)</sup>

Authority for Requirement: Iowa DNR Construction Permit 87-A-029S1

567 IAC 23.3(2)"d"

(1) Per DNR Air Quality Policy 3-b-08, <u>Opacity Limits</u>, an exceedence of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 0.61 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 87-A-029S1

Pollutant: Particulate Matter Emission Limit(s): 0.01 gr/scf

Authority for Requirement: Iowa DNR Construction Permit 87-A-029S1

567 IAC 23.4(13)

Pollutant: Volatile Organic Compounds (VOC's)

Emission Limit(s): See "Source Emission Limits" (page 8)

Authority for Requirement: Iowa DNR Construction Permit 87-A-029S1

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: Iowa DNR Construction Permit 87-A-029S1

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: Iowa DNR Construction Permit 87-A-029S1

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

# Process throughput:

1. Only one spray gun may be used in the RIM adhesive spray booth at any one time.

# Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

- A. The permittee shall maintain the following daily records:
  - 1. The identification and amount (gallons) of each coating and solvent used in the spray booth.
- B. The permittee shall maintain the following monthly records:
  - 1. The identification, the VOC content and the amount (gallons) of each coating and solvent used in the spray booth.
  - 2. See "Source Reporting & Record Keeping Requirements" (page 9)
  - 3. The individual and total HAP content of each coating and solvent used in the spray booth.
  - 4. See "Facility Wide Reporting & Record Keeping Requirements" (page 8)
- C. If the rolling, 12-month total of the VOC emission rate from emission units EU10PS, EU12PS, EUC3PSC, EUC7PS, EUC9PS, EUE3PD, EUE3PS1, EUL4PS, EU RIM MOLD/WAX 1, and RIM MOLD/WAX 2 exceeds 212 tons per year, the permittee shall maintain the following daily records:
  - 1. The identification, the VOC content and the amount (gallons) of each coating and solvent used in the spray booth.
  - 2. See "Source Reporting & Record Keeping Requirements" (page 9)
- D. The permittee shall submit deviation reports that identify all exceedances of the rolling 12-month emission limitations for VOC and HAPs. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.

Authority for Requirement: Iowa DNR Construction Permit 87-A-029S1

#### **Emission Point Characteristics**

Each emission point shall conform to the specifications listed below.

EP	Stack Height (ft)	Stack Opening (inches)	Stack Exhaust Flow Rate (scfm)	Stack Temperature (°F)	Discharge Type	Construction Permit
EP RRHA	13	38 x 38	8,000	70	Vertical, Unobstructed	02-A-148
EP SC	14	38 x 38	3,850	75	Horizontal	02-A-272
EPC3PS-3-B	12.7	32 (diameter)	7,118	73	Vertical Unobstructed	87-A-029S1

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required?	Yes 🖂	No 🗌
Required for CEC3PSWa		

#### Weekly

- Inspect the paint booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

#### **Record Keeping and Reporting**

Maintenance and inspection records will be kept for five years and available upon request.

#### **Quality Control**

• The filter equipment will be operated and maintained according to the manufacturers recommendations.

Facility Maintained Operation & Maintenance Plan Required? Yes  $\square$  No  $\boxtimes$ 

Authority for Requirement: 567 IAC 22.108(3)"b"

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#### **Emission Point ID Number: C2PSCK**

# **Associated Equipment**

EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
C2PSCK	Paint Kitchen	NA	Paint	NA	00 4 96651
C2PSCK-2	Paint Kitchen	NA	Paint	NA	99-A-866S1

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#### **Applicable Requirements**

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

VOC and HAP emissions are accounted for through spray booths C10 and C12.

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height (feet): 40' 6"	
Stack Diameter (inches): 12	
Stack Exhaust Flow Rate (scfm): 550	
Stack Temperature (°F): 70	
Vertical, Unobstructed Discharge Required: Yes	No 🗌
Authority for Requirement: Iowa DNR Construction Permit	99-A-866S1

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

listed below.
Agency Approved Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Numbers: C7-C9 O1B, C7-C9 O2B, C7-C9 O3B

# **Associated Equipment**

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
C7-C9 O1B			NA			02-A-153
C7-C9 O2B	C7-CPO1	C7-C9 Bake Oven	NA	Natural Gas	4 MMBtu/hr	02-A-154
C7-C9 O3B			NA			02-A-0155

#### **Applicable Requirements**

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40 %<sup>(1)</sup>

Authority for Requirement: Iowa DNR Construction Permits 02-A-153, 02-A-154, 02-A-155

567 IAC 23.3(2)"d"

(1) Per DNR Air Quality Policy 3-b-08, <u>Opacity Limits</u>, an exceedence of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 0.013 lb/hr

Authority for Requirement: Iowa DNR Construction Permits 02-A-153, 02-A-154, 02-A-155

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/scf

Authority for Requirement: Iowa DNR Construction Permits 02-A-153, 02-A-154, 02-A-155

567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv

Authority for Requirement: Iowa DNR Construction Permits 02-A-153, 02-A-154, 02-A-155

567 IAC 23.3(3)"e"

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Process throughput:

1. The oven shall be fired by natural gas or liquefied petroleum gas only. The heat input to the oven is 4.0 MMBTU/hr.

Authority for Requirement: Iowa DNR Construction Permits 02-A-153, 02-A-154, 02-A-155

#### Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

1. See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

Authority for Requirement: See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

#### **Emission Point Characteristics**

Each emission point shall conform to the specifications listed below.

Stack Height (feet): 38	
Stack Diameter (inches): 18	
Stack Exhaust Flow Rate (scfm): 2,500	
Stack Temperature (°F): 175	
Vertical, Unobstructed Discharge Required: Yes	No 🗌
Authority for Requirement: Iowa DNR Construction Permit	s 02-A-153, 02-A-154, 02-A-155

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

# **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

listed below.
Agency Approved Operation & Maintenance Plan Required? Yes $\square$ No $\boxtimes$
Facility Maintained Operation & Maintenance Plan Required? Yes $\square$ No $\boxtimes$
Authority for Requirement: 567 IAC 22.108(3)"b"

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# **Emission Point ID Numbers: EPC7PS-1-B, EPC7PS-2-B**

# **Associated Equipment**

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EPC7PS-1-B	EUC7PS	C7 Paint	CEC7PSWa: Mat Filter	Paint,	4.75 gal/hr, 2.75 MMBtu/hr	02-A-180
EPC7PS-2-B		System Booth	CEC7PSWb: Mat Filter	Natural Gas		02-A-181

**Applicable Requirements** 

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40 %<sup>(1)</sup>

Authority for Requirement: Iowa DNR Construction Permits 02-A-180, 02-A-181

567 IAC 23.3(2)"d"

(1) Per DNR Air Quality Policy 3-b-08, <u>Opacity Limits</u>, an exceedence of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 1.31 lb/hr

Authority for Requirement: Iowa DNR Construction Permits 02-A-180, 02-A-181

Pollutant: Particulate Matter Emission Limit(s): 0.01 gr/scf

Authority for Requirement: Iowa DNR Construction Permits 02-A-180, 02-A-181

567 IAC 23.4(13)

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv

Authority for Requirement: Iowa DNR Construction Permits 02-A-180, 02-A-181

567 IAC 23.3(3)"e"

Pollutant: Volatile Organic Compounds (VOC's)

Emission Limit(s): See "Source Emission Limits" (page 8)

Authority for Requirement: Iowa DNR Construction Permits 02-A-180, 02-A-181

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: Iowa DNR Construction Permits 02-A-180, 02-A-181

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: Iowa DNR Construction Permits 02-A-180, 02-A-181

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

# Process throughput:

- 1. The spray booth's air heater shall be fired by natural gas or liquefied petroleum gas only. The heat input to the burner is 2.75 MMBTU/hr.
- 2. Only one spray gun may be used in the C7 spray booth at any one time.

# Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

- A. The permittee shall maintain the following daily records:
  - 1. The identification and amount (gallons) of each coating and solvent used in the paint spray booth.
- B. The permittee shall maintain the following monthly records:
  - 1. The identification, the VOC content and the amount (gallons) of each coating and solvent used in the spray booth.
  - 2. See "Source Reporting & Record Keeping Requirements" (page 9)
  - 5. The individual and total HAP content of each coating and solvent used in the paint spray booth.
  - 6. See "Facility Wide Reporting & Record Keeping Requirements" (page 8)
- C. If the rolling, 12-month total of the VOC emission rate from emission units EU10PS, EU12PS, EUC3PSC, EUC7PS, EUC9PS, EUE3PD, EUE3PS1, EUL4PS, EU RIM MOLD/WAX 1, and RIM MOLD/WAX 2 exceeds 212 tons per year, the permittee shall maintain the following daily records:
  - 1. The identification, the VOC content and the amount (gallons) of each coating and solvent used in the spray booth.
  - 2. See "Source Reporting & Record Keeping Requirements" (page 9)
- D. The permittee shall submit deviation reports that identify all exceedances of the rolling 12-month emission limitations for VOC and HAPs. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.

Authority for Requirement: Iowa DNR Construction Permits 02-A-180, 02-A-181

Emission Point Characteristics
Each emission point shall conform to the specifications listed below.
Stack Height (feet): 23' 6"
Stack Diameter (inches): 30
Stack Exhaust Flow Rate (scfm): 15,289
Stack Temperature (°F): 73
Vertical, Unobstructed Discharge Required: Yes No
Authority for Requirement: Iowa DNR Construction Permits 02-A-180, 02-A-181
The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.
Periodic Monitoring Requirements  The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.
Agency Approved Operation & Maintenance Plan Required? Yes ⊠ No ☐ Required for CEC7PSWa and CEC7PSWb
Weekly
• Inspect the paint booth system for conditions that reduce the operating efficiency of the collection system. This
will include a visual inspection of the condition of the filter material.
• Maintain a written record of the observation and any action resulting from the inspection.
Record Keeping and Reporting  Maintenance and inspection records will be kept for five years and available upon request.
Quality Control
• The filter equipment will be operated and maintained according to the manufacturers recommendations.

# Facility Maintained Operation & Maintenance Plan Required? Yes $\square$ No $\boxtimes$

Authority for Requirement: 567 IAC 22.108(3)"b"

# **Emission Point ID Numbers: EPC9PS-1-B, EPC9PS-2-B**

# Associated Equipment

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EPC9PS-1-B	- EUC9PS	C9 Paint	CEC9PSWa: Mat Filter	Paint, 4.	4.75 gal/hr, 2.75 MMBtu/hr	81-A-075S1
EPC9PS-2-B		System Booth	CEC9PSWb: Mat Filter	Natural Gas		02-A-182

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# **Applicable Requirements**

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40 %<sup>(1)</sup>

Authority for Requirement: Iowa DNR Construction Permits 81-A-075S1, 02-A-182

567 IAC 23.3(2)"d"

(1) Per DNR Air Quality Policy 3-b-08, <u>Opacity Limits</u>, an exceedence of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 1.31 lb/hr

Authority for Requirement: Iowa DNR Construction Permits 81-A-075S1, 02-A-182

Pollutant: Particulate Matter Emission Limit(s): 0.01 gr/scf

Authority for Requirement: Iowa DNR Construction Permits 81-A-075S1, 02-A-182

567 IAC 23.4(13)

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv

Authority for Requirement: Iowa DNR Construction Permits 81-A-075S1, 02-A-182

567 IAC 23.3(3)"e"

Pollutant: Volatile Organic Compounds (VOC's)

Emission Limit(s): See "Source Emission Limits" (page 8)

Authority for Requirement: Iowa DNR Construction Permits 81-A-075S1, 02-A-182

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: Iowa DNR Construction Permits 81-A-075S1, 02-A-182

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: Iowa DNR Construction Permits 81-A-075S1, 02-A-182

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Process throughput:

- 1. The spray booth's air heater shall be fired by natural gas or liquefied petroleum gas only. The heat input to the burner is 2.75 MMBTU/hr.
- 2. Only one spray gun may be used in the C9 spray booth at any one time.

#### Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

- A. The permittee shall maintain the following daily records:
  - 1. The identification and amount (gallons) of each coating and solvent used in the paint spray booth.
- B. The permittee shall maintain the following monthly records:
  - 1. The identification, the VOC content and the amount (gallons) of each coating and solvent used in the spray booth.
  - 2. See "Source Reporting & Record Keeping Requirements" (page 9)
  - 3. The individual and total HAP content of each coating and solvent used in the spray booth.
  - 4. See "Facility Wide Reporting & Record Keeping Requirements" (page 8)
- C. If the rolling, 12-month total of the VOC emission rate from emission units EU10PS, EU12PS, EUC3PSC, EUC7PS, EUC9PS, EUE3PD, EUE3PS1, EUL4PS, EU RIM MOLD/WAX 1, and RIM MOLD/WAX 2 exceeds 212 tons per year, the permittee shall maintain the following daily records:
  - 1. The identification, the VOC content and the amount (gallons) of each coating and solvent used in the spray booth.
  - 2. See "Source Reporting & Record Keeping Requirements" (page 9)
- D. The permittee shall submit deviation reports that identify all exceedances of the rolling 12-month emission limitations for VOC and HAPs. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.

Authority for Requirement: Iowa DNR Construction Permits 81-A-075S1, 02-A-182

# **Emission Point Characteristics**

Emission Font Characteristics
Each emission point shall conform to the specifications listed below.
Stack Height (feet): 27
Stack Diameter (inches): 36
Stack Exhaust Flow Rate (scfm): 19,088
Stack Temperature (°F): 73
Vertical, Unobstructed Discharge Required: Yes No No
Authority for Requirement: Iowa DNR Construction Permits 81-A-075S1, 02-A-182
The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.
Periodic Monitoring Requirements
The owner/operator of this equipment shall comply with the periodic monitoring requirements
listed below.
Agency Approved Operation & Maintenance Plan Required? Yes ⊠ No ☐ Required for CEC9PSWa and CEC9PSWb
Weekly
• Inspect the paint booth system for conditions that reduce the operating efficiency of the collection system. This
will include a visual inspection of the condition of the filter material.
<ul> <li>Maintain a written record of the observation and any action resulting from the inspection.</li> </ul>
<b>Record Keeping and Reporting</b> Maintenance and inspection records will be kept for five years and available upon request.
Quality Control
• The filter equipment will be operated and maintained according to the manufacturers recommendations.

Facility Maintained Operation & Maintenance Plan Required? Yes  $\square$  No  $\boxtimes$ 

Authority for Requirement: 567 IAC 22.108(3)"b"

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#### **Emission Point ID Number: EPC10PS5-O**

# **Associated Equipment**

EU	EU Description	Control Equipment	Raw Material	Rated Capacity
EUC10PS5-O	C10 Paint System Oven	NA	Natural Gas	7.5 MMBtu/hr

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### **Applicable Requirements**

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40 %<sup>(1)</sup>

Authority for Requirement: Iowa DNR Construction Permit 97-A-632S1

567 IAC 23.3(2)"d"

(1) Per DNR Air Quality Policy 3-b-08, <u>Opacity Limits</u>, an exceedence of the indicator opacity of 20% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/scf

Authority for Requirement: Iowa DNR Construction Permit 97-A-632S1

567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

# **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Process throughput:

1. This unit shall be fired by natural gas or propane only.

Authority for Requirement: Iowa DNR Construction Permit 97-A-632S1

### Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

1. See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

Authority for Requirement: See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height (feet): 43
Stack Diameter (inches): 24
Stack Exhaust Flow Rate (scfm): 8,000
Stack Temperature (°F): 200
Vertical, Unobstructed Discharge Required: Yes No No
Authority for Requirement: Iowa DNR Construction Permit 97-A-632S1
The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.
Periodic Monitoring Requirements  The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.
Agency Approved Operation & Maintenance Plan Required? Yes  No
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)"b"

# Emission Point ID Numbers: EPC10PS-1B, EPC10PS-2B, EPC10PS-3B, EPC10PS-4B

# **Associated Equipment**

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EPC10PS-1B	EUC10PS	C10 Paint System Booth	CEC10PSW: Waterwall	Paint, Natural Gas	38 gal/hr., 10 MMBtu/hr	78-A-080S5
EPC10PS-2B						97-A-629S3
EPC10PS-3B						97-A-630S3
EPC10PS-4B						97-A-631S3

# **Applicable Requirements**

# Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40 %<sup>(1)</sup>

Authority for Requirement: Iowa DNR Construction Permits 78-A-080S5, 97-A-629S3,

97-A-630S3, 97-A-631S3 567 IAC 23.3(2)"d"

(1) Per DNR Air Quality Policy 3-b-08, <u>Opacity Limits</u>, if visible emissions are observed other than startup, shutdown, or malfunction, a stack test may be required to demonstrate compliance with the particulate standard. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 2.17 lb/hr

Authority for Requirement: Iowa DNR Construction Permits 78-A-080S5, 97-A-629S3,

97-A-630S3, 97-A-631S3

Pollutant: Particulate Matter

Emission Limit(s): 2.17 lb/hr, 0.01 gr/scf

Authority for Requirement: Iowa DNR Construction Permits 78-A-080S5, 97-A-629S3,

97-A-630S3, 97-A-631S3

567 IAC 23.4(13)

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv

Authority for Requirement: Iowa DNR Construction Permits 78-A-080S5, 97-A-629S3,

97-A-630S3, 97-A-631S3

567 IAC 23.3(3)"e"

Pollutant: Volatile Organic Compounds (VOC's)

Emission Limit(s): See "Source Emission Limits" (page 8)

Authority for Requirement: Iowa DNR Construction Permits 78-A-080S5, 97-A-629S3,

97-A-630S3, 97-A-631S3

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: Iowa DNR Construction Permits 78-A-080S5, 97-A-629S3,

97-A-630S3, 97-A-631S3

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: Iowa DNR Construction Permits 78-A-080S5, 97-A-629S3,

97-A-630S3, 97-A-631S3

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Process throughput:

- 1. The spray booth's air heater shall be fired by natural gas or liquefied petroleum gas only. The heat input to the burner is 10.0 MMBTU/hr.
- 2. Only four spray guns may be used in spray booth C10 simultaneously.

# Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

- A. The permittee shall maintain the following daily records:
  - 1. The identification and amount (gallons) of each coating and solvent used in the paint spray booth.
- B. The permittee shall maintain the following monthly records:
  - 1. The identification, the VOC content and the amount (gallons) of each coating and solvent used in the spray booth.
  - 2. See "Source Reporting & Record Keeping Requirements" (page 9)
  - 3. The individual and total HAP content of each coating and solvent used in the paint spray booth.
  - 4. See "Facility Wide Reporting & Record Keeping Requirements" (page 8)
- C. If the rolling, 12-month total of the VOC emission rate from emission EU10PS, EU12PS, EUC3PSC, EUC7PS, EUC9PS, EUE3PD, EUE3PS1, EUL4PS, EU RIM MOLD/WAX 1, and RIM MOLD/WAX 2 exceeds 212 tons per year, the permittee shall maintain the following daily records:
  - 1. The identification, the VOC content and the amount (gallons) of each coating and solvent used in the spray booth.
  - 2. See "Source Reporting & Record Keeping Requirements" (page 9)

D. The permittee shall submit deviation reports that identify all exceedances of the rolling 12-month emission limitations for VOC and HAPs. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.

Authority for Requirement: Iowa DNR Construction Permits 78-A-080S5, 97-A-629S3, 97-A-630S3, 97-A-631S3

#### **Emission Point Characteristics**

Each emission point shall conform to the specifications listed below.

Stack Height (feet): 45

Stack Opening (inches): 39 x 50

Stack Exhaust Flow Rate (scfm): 42,210

Stack Temperature (°F): 73

Vertical, Unobstructed Discharge Required: Yes ⊠ No □

Authority for Requirement: Iowa DNR Construction Permits 78-A-080S5, 97-A-629S3,

97-A-630S3, 97-A-631S3

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

# **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

# Stack Testing Required for EPC10PS-1B, EPC10PS-2B, EPC10PS-3B, EPC10PS-4B<sup>(1)</sup>:

Pollutant – PM-10

Stack Test to be Completed by -09/09/2005

Test Method – 40 CFR 51, Appendix M, 201A with 202<sup>(2)</sup>

Authority for Requirement - 567 IAC 22.108(3)

Pollutant – Particulate Matter

Stack Test to be Completed by – 09/09/2005

Test Method – Iowa Compliance Sampling Manual Method 5

Authority for Requirement - 567 IAC 22.108(3)

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

<sup>&</sup>lt;sup>(1)</sup> The Department will accept representative testing for these emission points. The representative testing methods shall be approved by the Department prior to testing. <sup>(2)</sup> Or approved alternative.

Agency Approved Operation & Maintenance Plan Required? Ye	s No	$\boxtimes$
Facility Maintained Operation & Maintenance Plan Required? \	Yes 🖂 N	o 🗌

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

#### **Emission Point ID Number: EPC10W**

#### Associated Equipment

EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit	
EUC10W	C10 Wash System	NA	Reagent	1.17 gal/hr	01-A-1109	
EUC10D	C10 Wash Oven	NA	Natural Gas 7.25 MMBtu/hr	7.25 MMBtu/hr	01-A-1109	

#### **Applicable Requirements**

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40 %<sup>(1)</sup>

Authority for Requirement: Iowa DNR Construction Permit 01-A-1109

567 IAC 23.3(2)"d"

(1)Per DNR Air Quality Policy 3-b-08, <u>Opacity Limits</u>, an exceedence of the indicator opacity of "No Visible Emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter

Emission Limit(s): 2.37 lb/hr, 0.1 gr/scf

Authority for Requirement: Iowa DNR Construction Permit 01-A-1109

567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv

Authority for Requirement: 567 IAC 23.3(3)"e"

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

# **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

# Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

1. See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

Authority for Requirement: See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

# **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height (feet): 41' 6"
Stack Opening (inches): 48 x 72
Stack Exhaust Flow Rate (acfm): 53,000
Stack Temperature (°F): 98
Vertical, Unobstructed Discharge Required: Yes No No
Authority for Requirement: Iowa DNR Construction Permit 01-A-1109
The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.
Periodic Monitoring Requirements
The owner/operator of this equipment shall comply with the periodic monitoring requirements
listed below.
Agency Approved Operation & Maintenance Plan Required? Yes  No
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)"b"

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#### **Emission Point ID Number: EPC12BO**

#### <u>Associated Equipment</u>

EU	EU Description	Control Equipment	Raw Material	Rated Capacity
EUC12BO	C12 Bake Oven	NA	Natural Gas	8 MMBtu/hr

#### **Applicable Requirements**

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40 %<sup>(1)</sup>

Authority for Requirement: Iowa DNR Construction Permit 97-A-636S2

567 IAC 23.3(2)"d"

(1) Per DNR Air Quality Policy 3-b-08, <u>Opacity Limits</u>, an exceedence of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 0.076 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 97-A-636S2

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/scf

Authority for Requirement: Iowa DNR Construction Permit 97-A-636S2

567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv

Authority for Requirement: Iowa DNR Construction Permit 97-A-636S2

567 IAC 23.3(3)"e"

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

## **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

## Process throughput:

1. The oven shall be fired by natural gas or liquefied petroleum gas only. The total heat input to the oven is 8.0 MMBTU/hr.

Authority for Requirement: Iowa DNR Construction Permit 97-A-636S2

#### Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

See "Facility Wide Reporting & Record Keeping Requirements" (page 8)
 Authority for Requirement: See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

#### **Emission Point Characteristics**

Stack Height (feet): 34 Stack Diameter (inches): 36

The emission point shall conform to the specifications listed below.

Stack Exhaust Flow Rate (scfm): 10,300
Stack Temperature (°F): 160
Vertical, Obstructed Discharge Required: Yes No No
Authority for Requirement: Iowa DNR Construction Permit 97-A-636S2
The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.
Periodic Monitoring Requirements
The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.
Agency Approved Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)"b"

## Emission Point ID Numbers: EPC12PS-1B, EPC12PS-2B, EPC12PS-3B, EPC12PS-4B

## **Associated Equipment**

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EPC12PS-1B						94-A-263S3
EPC12PS-2B	FUCIAR	C12PG C12 Paint	CEC12PSW:	Paint,	38 gal/hr,	97-A-633S2
EPC12PS-3B	EUC12PS	System Booth	Waterwall	Natural Gas	15 MMBtu/hr	97-A-634S2
EPC12PS-4B						97-A-635S2

#### **Applicable Requirements**

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

#### All EP's

Pollutant: Opacity

Emission Limit(s): 40 %<sup>(1)</sup>

Authority for Requirement: Iowa DNR Construction Permits 94-A-263S3, 97-A-633S2,

97-A-634S2, 97-A-635S2

567 IAC 23.3(2)"d"

(1) Per DNR Air Quality Policy 3-b-08, <u>Opacity Limits</u>, if visible emissions are observed other than startup, shutdown, or malfunction, a stack test may be required to demonstrate compliance with the particulate standard. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv

Authority for Requirement: Iowa DNR Construction Permits 94-A-263S3, 97-A-633S2,

97-A-634S2, 97-A-635S2 567 IAC 23.3(3)"e"

Pollutant: Volatile Organic Compounds (VOC's)

Emission Limit(s): See "Source Emission Limits" (page 8)

Authority for Requirement: Iowa DNR Construction Permits 94-A-263S3, 97-A-633S2,

97-A-634S2, 97-A-635S2

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: Iowa DNR Construction Permits 94-A-263S3, 97-A-633S2,

97-A-634S2, 97-A-635S2

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: Iowa DNR Construction Permits 94-A-263S3, 97-A-633S2,

97-A-634S2, 97-A-635S2

#### EP's EPC12PS-1B & EPC12PS-4B

Pollutant: PM-10

Emission Limit(s): 2.84 lb/hr

Authority for Requirement: Iowa DNR Construction Permits 94-A-263S3, 97-A-635S2

Pollutant: Particulate Matter

Emission Limit(s): 2.84 lb/hr, 0.01 gr/scf

Authority for Requirement: Iowa DNR Construction Permits 94-A-263S3, 97-A-635S2

567 IAC 23.4(13)

#### EP's EPC12PS-2B & EPC12PS-3B

Pollutant: PM-10

Emission Limit(s): 2.47 lb/hr

Authority for Requirement: Iowa DNR Construction Permits 97-A-633S2, 97-A-634S2

Pollutant: Particulate Matter

Emission Limit(s): 2.47 lb/hr, 0.01 gr/scf

Authority for Requirement: Iowa DNR Construction Permits 97-A-633S2, 97-A-634S2

567 IAC 23.4(13)

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Process throughput:

- 1. The spray booth's air heater shall be fired by natural gas or liquefied petroleum gas only. The heat input to the burner is 15.0 MMBTU/hr.
- 2. Only four spray guns may be used in spray booth C12 simultaneously.

#### Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

- A. The permittee shall maintain the following daily records:
  - 1. The identification and amount (gallons) of each coating and solvent used in the paint spray booth.

- B. The permittee shall maintain the following monthly records:
  - 1. The identification, the VOC content and the amount (gallons) of each coating and solvent used in the spray booth.
  - 2. See "Source Reporting & Record Keeping Requirements" (page 9)
  - 3. The individual and total HAP content of each coating and solvent used in the spray booth.
  - 4. See "Facility Wide Reporting & Record Keeping Requirements" (page 8)
- C. If the rolling, 12-month total of the VOC emission rate from emission units EU10PS, EU12PS, EUC3PSC, EUC7PS, EUC9PS, EUE3PD, EUE3PS1, EUL4PS, EU RIM MOLD/WAX 1, and RIM MOLD/WAX 2 exceeds 212 tons per year, the permittee shall maintain the following daily records:
  - 1. The identification, the VOC content and the amount (gallons) of each coating and solvent used in the spray booth.
  - 2. See "Source Reporting & Record Keeping Requirements" (page 9)
- D. The permittee shall submit deviation reports that identify all exceedances of the rolling 12-month emission limitations for VOC and HAPs. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.

Authority for Requirement: Iowa DNR Construction Permits 94-A-263S3, 97-A-633S2, 97-A-634S2, 97-A-635S2

#### **Emission Point Characteristics**

Each emission point shall conform to the specifications listed below.

EP	Stack Height (ft)	Stack Diameter (inches)	Stack Exhaust Flow Rate (scfm)	Stack Temperature (°F)	Discharge Type	Construction Permit
EPC12PS-1B	55	56	41,400	70	Vertical Unobstructed	94-A-263S3
EPC12PS-2B	55	56	36,000	70	Vertical Unobstructed	97-A-633S2
EPC12PS-3B	55	56	36,000	70	Vertical Unobstructed	97-A-634S2
EPC12PS-4B	55	56	41,400	70	Vertical Unobstructed	97-A-635S2

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

## Stack Testing Required for EPC12PS-1B, EPC12PS-2B, EPC12PS-3B, EPC12PS-4B<sup>(1)</sup>:

Pollutant – PM-10 Stack Test to be Completed by – 09/09/2005 Test Method – 40 CFR 51, Appendix M, 201A with 202<sup>(2)</sup> Authority for Requirement - 567 IAC 22.108(3)

Pollutant – Particulate Matter Stack Test to be Completed by – 09/09/2005 Test Method – Iowa Compliance Sampling Manual Method 5 Authority for Requirement - 567 IAC 22.108(3)

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

## Agency Approved Operation & Maintenance Plan Required? Yes No

## Facility Maintained Operation & Maintenance Plan Required? Yes 🖂 No 🗌

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

<sup>(1)</sup> The Department will accept representative testing for these emission points. The representative testing methods shall be approved by the Department prior to testing. (2) Or approved alternative.

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#### **Emission Point ID Number: EPE2**

#### **Associated Equipment**

EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EUE2 Wash	E2 Wash System	NA	Reagent	78 gal/day	02-A-016S2
EUE2 Oven	E2 Wash Oven	NA	Natural Gas	1.9 MMBtu/hr	02-A-01052

#### **Applicable Requirements**

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Allowed emissions from the stack:

Pollutant: Opacity

Emission Limit(s): 40 %<sup>(1)</sup>

Authority for Requirement: Iowa DNR Construction Permit 02-A-016S2

567 IAC 23.3(2)"d"

(1) Per DNR Air Quality Policy 3-b-08, <u>Opacity Limits</u>, an exceedance of the indicator opacity of 10% will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. The permit holder shall also file an "indicator opacity exceedance report" with the DNR field office and keep records as required in the policy. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 3.29 lb/hr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 02-A-016S2

Pollutant: Particulate Matter

Emission Limit(s): 5.57 lb/hr<sup>(2)</sup>, 0.1 gr/scf

Authority for Requirement: Iowa DNR Construction Permit 02-A-016S2

567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 1.0 lb/hr<sup>(2)</sup>

Authority for Requirement: Iowa DNR Construction Permit 02-A-016S2

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

#### Allowable emissions from EUE2Wash

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/scf

Authority for Requirement: Iowa DNR Construction Permit 02-A-016S2

567 IAC 23.3(2)"a"

#### Allowable emissions from EUE2Oven

Pollutant: Particulate Matter Emission Limit(s): 0.6 lb/MMBtu

Authority for Requirement: Iowa DNR Construction Permit 02-A-016S2

567 IAC 23.3(2)"b"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv

Authority for Requirement: Iowa DNR Construction Permit 02-A-016S2

567 IAC 23.3(3)"e"

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

- 1. A record of each time reagent is added to the system must maintained. This record shall include the date and time the addition occurred as well as the quantity of reagent added.
- 2. See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

Authority for Requirement: Iowa DNR Construction Permit 02-A-016S2

See "Facility Wide Reporting & Record Keeping Requirements"

(page 8)

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height (feet): 30 Stack Diameter (inches): 33

Stack Exhaust Flow Rate (scfm): 11,200

Stack Temperature (°F): 70

Vertical, Unobstructed Discharge Required: Yes No

Authority for Requirement: Iowa DNR Construction Permit 02-A-016S2

<sup>(2)</sup> Standard expressed as the average of three (3) runs.

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

## **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes \(\subseteq\) No \(\subseteq\)

Facility Maintained Operation & Maintenance Plan Required? Yes  $\square$  No  $\boxtimes$ 

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Numbers: EPE3P-1-O, EPE3P-2-O, EPE3P-3-O, EPE3P-4-O, EPE3P-5-O, EPE3P-6-O,

## Associated Equipment

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
ЕРЕЗР-1-О						96-A-439S1
EPE3P-2-O						02-A-273
ЕРЕЗР-3-О	ELIEADO	E3 Paint Dip	NYA	D : .	21.1.10	02-A-274
EPE3P-4-O	EUE3PD	Tanks (2 tanks)	NA	Paint	21.1 gal/hr	02-A-275
EPE3P-5-O						02-A-276
ЕРЕЗР-6-О						02-A-277

#### **Applicable Requirements**

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Volatile Organic Compounds (VOC's)

Emission Limit(s): See "Source Emission Limits" (page 8)

Authority for Requirement: Iowa DNR Construction Permits 96-A-439S1, 02-A-273, 02-A-274,

02-A-275, 02-A-276, 02-A-277

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: Iowa DNR Construction Permits 96-A-439S1, 02-A-273, 02-A-274,

02-A-275, 02-A-276, 02-A-277

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: Iowa DNR Construction Permits 96-A-439S1, 02-A-273, 02-A-274,

02-A-275, 02-A-276, 02-A-277

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

- A. The permittee shall maintain the following daily records:
  - 1. The identification and amount (gallons) of each coating and solvent used in the dip tanks.
- B. The permittee shall maintain the following monthly records:
  - 1. The identification, the VOC content and the amount (gallons) of each coating and solvent used in the dip tanks.
  - 2. See "Source Reporting & Record Keeping Requirements" (page 9)
  - 3. The individual and total HAP content of each coating and solvent used in the dip tanks.
  - 4. See "Facility Wide Reporting & Record Keeping Requirements" (page 8)
- C. If the rolling, 12-month total of the VOC emission rate from emission EU10PS, EU12PS, EUC3PSC, EUC7PS, EUC9PS, EUE3PD, EUE3PS1, EUL4PS, EU RIM MOLD/WAX 1, and RIM MOLD/WAX 2 exceeds 212 tons per year, the permittee shall maintain the following daily records:
  - 1. The identification, the VOC content and the amount (gallons) of each coating and solvent used in the dip tanks.
  - 2. See "Source Reporting & Record Keeping Requirements" (page 9)
- D. The permittee shall submit deviation reports that identify all exceedances of the rolling 12-month emission limitations for VOC and HAPs. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.

Authority for Requirement: Iowa DNR Construction Permits 96-A-439S1, 02-A-273, 02-A-274, 02-A-275, 02-A-276, 02-A-277

#### **Emission Point Characteristics**

Each emission point shall conform to the specifications listed below.

EP	Stack Height (ft)	Stack Diameter (inches)	Stack Exhaust Flow Rate (scfm)	Stack Temperature (°F)	Discharge Type	Construction Permit
EPE3P-1-O	23' 10"	24	7,400	75	Vertical Unobstructed	96-A-439S1
EPE3P-2-O	24' 2"	24	9,150	75	Vertical Unobstructed	02-A-273
ЕРЕЗР-3-О	18	30	4,500	75	Vertical Unobstructed	02-A-274
EPE3P-4-O	18	30	4,500	75	Vertical Unobstructed	02-A-275
EPE3P-5-O	18	30	4,500	75	Vertical Unobstructed	02-A-276
EPE3P-6-O	18	30	4,500	75	Vertical Unobstructed	02-A-277

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes \(\subseteq\) No \(\subseteq\)
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🗵
Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Numbers: EPE3PS-1B, EPE3PS-2B, EPE3PS-3B, EPE3PS-4B

#### **Associated Equipment**

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit	
EPE3PS-1B			CEE3PS1: Mat Filter			02-A-183	
EPE3PS-2B	ELIE ADG1	EUE2DG1	E3 Paint	CEE3PS2: Mat Filter	Doint	12.71/6	02-A-184
EPE3PS-3B	EUE3PS1	Spray Booth	CEE3PS3: Mat Filter	- Paint	12.7gal/hr	02-A-549	
EPE3PS-4B			CEE3PS4: Mat Filter			02-A-550	

## **Applicable Requirements**

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40 %<sup>(1)</sup>

Authority for Requirement: Iowa DNR Construction Permits 02-A-183, 02-A-184, 02-A-549,

02-A-550

567 IAC 23.3(2)"d"

(1) Per DNR Air Quality Policy 3-b-08, <u>Opacity Limits</u>, an exceedence of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 1.37 lb/hr

Authority for Requirement: Iowa DNR Construction Permits 02-A-183, 02-A-184, 02-A-549,

02-A-550

Pollutant: Particulate Matter Emission Limit(s): 0.01 gr/scf

Authority for Requirement: Iowa DNR Construction Permits 02-A-183, 02-A-184, 02-A-549,

02-A-550

567 IAC 23.4(13)

Pollutant: Volatile Organic Compounds (VOC's)

Emission Limit(s): See "Source Emission Limits" (page 8)

Authority for Requirement: Iowa DNR Construction Permits 02-A-183, 02-A-184, 02-A-549,

02-A-550

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: Iowa DNR Construction Permits 02-A-183, 02-A-184, 02-A-549,

02-A-550

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: Iowa DNR Construction Permits 02-A-183, 02-A-184, 02-A-549,

02-A-550

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Process throughput:

1. Only two spray guns may be used in the E3 spray booth at any one time.

#### Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

- A. The permittee shall maintain the following daily records:
  - 1. The identification and amount (gallons) of each coating and solvent used in the paint spray booth.
- B. The permittee shall maintain the following monthly records:
  - 1. The identification, the VOC content and the amount (gallons) of each coating and solvent used in the spray booth.
  - 2. See "Source Reporting & Record Keeping Requirements" (page 9)
  - 3. The individual and total HAP content of each coating and solvent used in the paint spray booth.
  - 4. See "Facility Wide Reporting & Record Keeping Requirements" (page 8)
- C. If the rolling, 12-month total of the VOC emission rate from emission units EU10PS, EU12PS, EUC3PSC, EUC7PS, EUC9PS, EUE3PD, EUE3PS1, EUL4PS, EU RIM MOLD/WAX 1, and RIM MOLD/WAX 2 exceeds 212 tons per year, the permittee shall maintain the following daily records:
  - 3. The identification, the VOC content and the amount (gallons) of each coating and solvent used in the spray booth.
  - 4. See "Source Reporting & Record Keeping Requirements" (page 9)
- D. The permittee shall submit deviation reports that identify all exceedances of the rolling 12-month emission limitations for VOC and HAPs. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.

Authority for Requirement: Iowa DNR Construction Permits 02-A-183, 02-A-184, 02-A-549, 02-A-550

#### **Emission Point Characteristics**

Each emission point shall conform to the specifications listed below.

Stack Height (feet): 40' 6" Stack Diameter (inches): 42

Stack Exhaust Flow Rate (scfm): 20,000

Stack Temperature (°F): 73

Vertical, Unobstructed Discharge Required: Yes ⊠ No □

Authority for Requirement: Iowa DNR Construction Permits 02-A-183, 02-A-184, 02-A-549,

02-A-550

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

## **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

## Stack Testing Required for EPE3PS-1B, EPE3PS-2B, EPE3PS-3B, EPE3PS-4B (1):

Pollutant – PM-10 Stack Test to be Completed by – 09/09/2005 Test Method – 40 CFR 51, Appendix M, 201A with 202<sup>(2)</sup> Authority for Requirement - 567 IAC 22.108(3)

Pollutant – Particulate Matter Stack Test to be Completed by – 09/09/2005 Test Method – Iowa Compliance Sampling Manual Method 5 Authority for Requirement - 567 IAC 22.108(3)

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

<sup>(1)</sup> The Department will accept representative testing for these emission points. The representative testing methods shall be approved by the Department prior to testing. (2) Or approved alternative.

Agency Approved Operation & Maintenance Plan Required?	Yes 🖂	No 🗌
Required for CEE3PS1, CEE3PS2, CEE3PS3, CEE3PS4		

W	ee	kl	y

- Inspect the paint booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.
- Maintain a written record of the observation and any action resulting from the inspection.

#### **Record Keeping and Reporting**

Maintenance and inspection records will be kept for five years and available upon request.

#### **Quality Control**

• The filter equipment will be operated and maintained according to the manufacturers recommendations.

Facility Maintained Operation & Maintenance Plan Required? Yes No 🖂

Authority for Requirement: 567 IAC 22.108(3)"b"

#### **Emission Point ID Number: EPE4 Oven**

#### <u>Associated Equipment</u>

EU	EU Description	Control Equipment	Raw Material	Rated Capacity
EUE4 Oven	E4 Paint Line Oven	NA	Natural Gas	3.7 MMBtu/hr

#### **Applicable Requirements**

## Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40 %<sup>(1)</sup>

Authority for Requirement: Iowa DNR Construction Permit 02-A-042

567 IAC 23.3(2)"d"

(1) Per DNR Air Quality Policy 3-b-08, <u>Opacity Limits</u>, an exceedence of the indicator opacity of (25%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/scf

Authority for Requirement: Iowa DNR Construction Permit 02-A-042

567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv

Authority for Requirement: Iowa DNR Construction Permit 02-A-042

567 IAC 23.3(3)"e"

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Process throughput:

1. The oven shall be fired by natural gas or liquefied petroleum gas only. The heat input to the burner is 3.7 MMBTU/hr.

Authority for Requirement: Iowa DNR Construction Permit 02-A-042

#### Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

See "Facility Wide Reporting & Record Keeping Requirements" (page 8)
 Authority for Requirement: See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

#### **Emission Point Characteristics**

Stack Height (feet): 24

The emission point shall conform to the specifications listed below.

Stack Diameter (inches): 18
Stack Exhaust Flow Rate (scfm): 3,540
Stack Temperature (°F): 230
Vertical, Unobstructed Discharge Required: Yes No No
Authority for Requirement: Iowa DNR Construction Permit 02-A-042
The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.
Periodic Monitoring Requirements
The owner/operator of this equipment shall comply with the periodic monitoring requirements
listed below.
Agency Approved Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)"b"

**Emission Point ID Number: EPL4PS-1-B, EPL4PS-2-B** 

#### **Associated Equipment**

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity	Construction Permit
EPL4PS-1-B	EUL4PS	I / Paint System	CEL4PSWa: Mat Filter	Paint,	4.75 gal/hr, 3.57 MMBtu/hr	86-A-004S1
EPL4PS-2-B		Spray Booth	CEL4PSWb: Mat Filter	Natural Gas		02-A-185

#### **Applicable Requirements**

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40 %<sup>(1)</sup>

Authority for Requirement: Iowa DNR Construction Permits 86-A-004S1, 02-A-185

567 IAC 23.3(2)"d"

(1) Per DNR Air Quality Policy 3-b-08, <u>Opacity Limits</u>, an exceedence of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 1.44 lb/hr

Authority for Requirement: Iowa DNR Construction Permits 86-A-004S1, 02-A-185

Pollutant: Particulate Matter Emission Limit(s): 0.01 gr/scf

Authority for Requirement: Iowa DNR Construction Permits 86-A-004S1, 02-A-185

567 IAC 23.4(13)

Pollutant: Volatile Organic Compounds (VOC's)

Emission Limit(s): See "Source Emission Limits" (page 8)

Authority for Requirement: Iowa DNR Construction Permits 86-A-004S1, 02-A-185

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: Iowa DNR Construction Permits 86-A-004S1, 02-A-185

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: Iowa DNR Construction Permits 86-A-004S1, 02-A-185

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Process throughput:

- 1. Only one spray gun may be used in the L4 spray booth at any one time.
- 2. The spray booth's air heater shall be fired by natural gas or liquefied petroleum gas only. The heat input to the burner is 3.57 MMBTU/hr.

## Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

- A. The permittee shall maintain the following daily records:
  - 1. The identification and amount (gallons) of each coating and solvent used in the paint spray booth.
- B. The permittee shall maintain the following monthly records:
  - 1. The identification, the VOC content and the amount (gallons) of each coating and solvent used in the spray booth.
  - 2. See "Source Reporting & Record Keeping Requirements" (page 9)
  - 3. The individual and total HAP content of each coating and solvent used in the paint spray booth.
  - 4. See "Facility Wide Reporting & Record Keeping Requirements" (page 8)
- C. If the rolling, 12-month total of the VOC emission rate from emission units EU10PS, EU12PS, EUC3PSC, EUC7PS, EUC9PS, EUE3PD, EUE3PS1, EUL4PS, EU RIM MOLD/WAX 1, and RIM MOLD/WAX 2 exceeds 212 tons per year, the permittee shall maintain the following daily records:
  - 1. The identification, the VOC content and the amount (gallons) of each coating and solvent used in the spray booth.
  - 2. See "Source Reporting & Record Keeping Requirements" (page 9)
- D. The permittee shall submit deviation reports that identify all exceedances of the rolling 12-month emission limitations for VOC and HAPs. The report shall be submitted no later than 30 days from the end of the month in which the exceedance occurred.

Authority for Requirement: Iowa DNR Construction Permits 86-A-004S1, 02-A-185

## **Emission Point Characteristics**

Each emission point shall conform to the specifications listed below.
Stack Height (feet): 32
Stack Diameter (inches): 36
Stack Exhaust Flow Rate (scfm): 16,880
Stack Temperature (°F): 73
Vertical, Unobstructed Discharge Required: Yes No No
Authority for Requirement: Iowa DNR Construction Permits 86-A-004S1, 02-A-185
The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.
Periodic Monitoring Requirements  The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.
Agency Approved Operation & Maintenance Plan Required? Yes $\boxtimes$ No $\square$ Required for CEL4PSWa and CEL4PSWb
<ul> <li>Weekly</li> <li>Inspect the paint booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.</li> <li>Maintain a written record of the observation and any action resulting from the inspection.</li> </ul>
Record Keeping and Reporting  Maintenance and inspection records will be kept for five years and available upon request.
<ul> <li>Quality Control</li> <li>The filter equipment will be operated and maintained according to the manufacturers recommendations.</li> </ul>
Facility Maintained Operation & Maintenance Plan Required? Yes \Boxedot No \Boxedot

Authority for Requirement: 567 IAC 22.108(3)"b"

**Emission Point ID Number: EP HT** 

#### <u>Associated Equipment</u>

EU	EU Description	Control Equipment	Raw Material	Rated Capacity
EUHTa	Heat Treat Furnace a	NA	Natural Gas, Cracked Methane	0.008 MMBtu/hr 500 ft <sup>3</sup> /hr
EUHTb	Heat Treat Furnace b	NA	Natural Gas, Cracked Methane	0.008 MMBtu/hr 500 ft <sup>3</sup> /hr

#### **Applicable Requirements**

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40 %<sup>(1)</sup>

Authority for Requirement: Iowa DNR Construction Permit 02-A-540

567 IAC 23.3(2)"d"

(1) Per DNR Air Quality Policy 3-b-08, <u>Opacity Limits</u>, an exceedence of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 0.002 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 02-A-540

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/scf

Authority for Requirement: Iowa DNR Construction Permit 02-A-540

567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv

Authority for Requirement: Iowa DNR Construction Permit 02-A-540

567 IAC 23.3(3)"e"

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Process throughput:

- 1. The maximum capacity of each furnace is 500 cubic feet of cracked gas per hour.
- 2. This process generates an atmosphere gas to harden steel parts. Excess gas shall be burned off prior to being discharged to the atmosphere.

Authority for Requirement: Iowa DNR Construction Permit 02-A-540

#### Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

1. See "Facility Wide Reporting & Record Keeping Requirements" (page 8) Authority for Requirement: See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

#### **Emission Point Characteristics**

The emission point shall conform to the specifications listed below.

Stack Height (feet): 25	
Stack Diameter (inches): 36	
Stack Exhaust Flow Rate (scfm): 15,400	
Stack Temperature (°F): 70	
Vertical, Unobstructed Discharge Required: Yes 🖂	No 🗌
Authority for Requirement: Iowa DNR Construction Permit	02-A-540

The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

#### **Periodic Monitoring Requirements**

rements

The owner/operator of this equipment shall comply with the periodic monitoring requilisted below.
Agency Approved Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)"b"

#### **Emission Point ID Number: EP D14**

#### <u>Associated Equipment</u>

EU	EU Description	Control Equipment	Raw Material	Rated Capacity
EU D14	Draw Furnace - Department 14	NA	Natural Gas	0.6 MMBtu/hr

#### **Applicable Requirements**

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40 %<sup>(1)</sup>

Authority for Requirement: Iowa DNR Construction Permit 02-A-156

567 IAC 23.3(2)"d"

(1) Per DNR Air Quality Policy 3-b-08, <u>Opacity Limits</u>, an exceedence of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Pollutant: PM-10

Emission Limit(s): 0.006 lb/hr

Authority for Requirement: Iowa DNR Construction Permit 02-A-156

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/scf

Authority for Requirement: Iowa DNR Construction Permit 02-A-156

567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 500 ppmv

Authority for Requirement: Iowa DNR Construction Permit 02-A-156

567 IAC 23.3(3)"e"

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Process throughput:

1. The oven shall be fired by natural gas or liquefied petroleum gas only. The heat input to the oven is 0.6 MMBTU/hr.

Authority for Requirement: Iowa DNR Construction Permit 02-A-156

#### Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

1. See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

Authority for Requirement: See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

#### **Emission Point Characteristics**

Stack Height (feet): 20

The emission point shall conform to the specifications listed below.

Stack Diameter (inches): 12
Stack Exhaust Flow Rate (scfm): 130
Stack Temperature (°F): 400
Vertical, Obstructed Discharge Required: Yes No No
Authority for Requirement: Iowa DNR Construction Permit 02-A-156
The temperature and flow rate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.
Periodic Monitoring Requirements
The owner/operator of this equipment shall comply with the periodic monitoring requirements
listed below.
Agency Approved Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)"b"

## **Emission Point ID Number: EPWPR (Vents Inside)**

## **Associated Equipment**

EU	EU Description	Control Equipment	Raw Material	Rated Capacity
EUWPR	Production welding	NA	Weld Wire	1,500,000 lb/yr

## **Applicable Requirements**

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Process throughput:

1. Weld Wire usage shall not exceed 1,500,000 pounds per 12-month rolling period.

Authority for Requirement: 567 IAC 22.108(14)

#### Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

- 1. Record on a monthly basis, the total amount of Weld Wire. Calculate and record rolling 12-month totals.
- 2. See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

Authority for Requirement: 567 IAC 22.108(15)

See "Facility Wide Reporting & Record Keeping Requirements"

(page 8)

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)"b"

## **Emission Point ID Numbers: EPMA, EPMPS, EPMSC (Vent Inside)**

## **Associated Equipment**

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity
EPMA	EUMA	Misc. Adhesive Usage	NA	Adhesive	5.86 gal/day
EPMPS	EUMPS	Misc. Paint Usage	NA	Paint	22.27 gal/day
EPMSC	EUMSC	Misc. Cleaning	NA	Cleaner	12 gal/day

#### **Applicable Requirements**

## Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the levels specified below.

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

1. See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

Authority for Requirement: See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes  No  No
Facility Maintained Operation & Maintenance Plan Required? Yes $\square$ No $\boxtimes$
Authority for Requirement: 567 IAC 22.108(3)"b"

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## Emission Point ID Numbers: EPC8EE, EPL3EE-1, EPL3EE-2, EPL4EE-1, EPL4EE-2, EPM6EE

## **Associated Equipment**

EP	EU	EU Description	Control Equipment	Raw Material	Rated Capacity
EPC8EE	EUEEa	Engine Exhaust in C8			
EPL3EE-1	EUEE	Engine Exhaust in L3			
EPL3EE-2	EUEE	Engine Exhaust in L3	NA	Diesel Fuel	220,000,001/200
EPL4EE-1	EUEE	Engine Exhaust in L4	INA	Diesei Fuei 230,000 gal	230,000 gal/yr
EPL4EE-2	EUEE	Engine Exhaust in L4			
EPM6EE	EUEE	Engine Exhaust in M6			

#### **Applicable Requirements**

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#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from each emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40 %

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter Emission Limit(s): 0.1 gr/scf

Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO<sub>2</sub>) Emission Limit(s): 2.5 lb/MMBtu

Authority for Requirement: 567 IAC 23.3(3)"b"(2)

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Process throughput:

1. No person shall allow, cause or permit the combustion of number 1 or number 2 fuel oil exceeding a sulfur content of 0.5 percent by weight.

Authority for Requirement: 567 IAC 23.3(3)"b"(1)

## Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

- 1. The facility shall monitor the percent of sulfur by weight in the fuel oil as delivered. The facility shall obtain a sulfur content certification from the fuel oil vendor annually. If the fuel oil vendor should change during the year, the facility shall obtain a sulfur content certification from the new vendor.
- 2. See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

Authority for Requirement: 567 IAC 22.108(3)

See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes  No
Facility Maintained Operation & Maintenance Plan Required? Yes 🗌 No 🖂
Authority for Requirement: 567 IAC 22.108(3)"b"

# Emission Point ID Numbers: EPTW3S-4, EPTW3S-1, EPTW3S-3 (Vent Inside)

## **Associated Equipment**

EP	EU	EU Description	Control Equipment	Raw Material	Tank Capacity
EPTW3S-4	EUTW3S-4	Solvent Tank (D100)		Solvent	550 gallons
EPTW3S-1	EUTW3S-1	Solvent Tank (A4206)	NA	Solvent	1,000 gallons
EPTW3S-3	EUTW3S-3	Solvent Tank (A2039)		Solvent	560 gallons

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#### **Applicable Requirements**

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from these emission points shall not exceed the levels specified below.

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

#### Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

1. See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

Authority for Requirement: See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

Periodic Monitoring Requirements
The owner/operator of this equipment shall comply with the periodic monitoring requirements
listed below.
Agency Approved Operation & Maintenance Plan Required? Yes \( \subseteq \) No \( \subseteq \)
Facility Maintained Operation & Maintenance Plan Required? Yes $\square$ No $\boxtimes$
Authority for Requirement: 567 IAC 22.108(3)"b"

## **Emission Point ID Number: EPMG (Vent Inside)**

## **Associated Equipment**

EU	EU Description	Control Equipment	Raw Material	Rated Capacity
EUMG	Facility Space Heaters (64 heaters) (See Appendix B for list of heaters)	NA	Natural Gas	(See Appendix B for list of individual rated capacities)

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#### **Applicable Requirements**

#### Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Fugitive Dust

Emission Limit: No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered, repaired or demolished, without taking reasonable precautions to prevent a nuisance. All persons shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate.

Authority for Requirement: 567 IAC 23.3(2)"c"

Pollutant: Hazardous Air Pollutants (HAP's) (Individual) Emission Limit(s): See "Facility Wide Limits" (page 7)

Authority for Requirement: See "Facility Wide Limits" (page 7)

Pollutant: Hazardous Air Pollutants (HAP's) (Total) Emission Limit(s): See "Facility Wide Limits" (page 7)

#### **Operational Limits & Requirements**

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

## Reporting & Record keeping:

All records as required by this permit shall be kept on site for a minimum of five (5) years and shall be available for inspection by the DNR.

See "Facility Wide Reporting & Record Keeping Requirements" (page 8)
 Authority for Requirement: See "Facility Wide Reporting & Record Keeping Requirements" (page 8)

#### **Periodic Monitoring Requirements**

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes  No
Facility Maintained Operation & Maintenance Plan Required? Yes   No   No
Authority for Requirement: 567 IAC 22.108(3)"b"

## IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

#### **G1. Duty to Comply**

- 1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. 567 IAC 22.108(9)"a"
- 2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. 567 IAC 22.105 (2)"h"(3)
- 3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. 567 IAC 22.108 (1)"b"
- 4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. 567 IAC 22.108 (14)
- 5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. 567 IAC 22.108 (9)"b"

## **G2. Permit Expiration**

- 1. Except as provided in 567 IAC 22.104, the expiration of this permit terminates the permittee's right to operate unless a timely and complete application has been submitted for renewal. Any testing required for renewal shall be completed before the application is submitted. 567 IAC 22.116(2)
- 2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall present or mail the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, 7900 Hickman Rd, Suite #1, Urbandale, Iowa 50322, four or more copies of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. The definition of a complete application is as indicated in 567 IAC 22.105(2). 567 IAC 22.105

#### **G3.** Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. 567 IAC 22.107 (4)

#### **G4.** Annual Compliance Certification

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification

shall be submitted to the administrator, director, and the appropriate DNR Field office. 567 IAC 22.108 (15)"e"

#### **G5. Semi-Annual Monitoring Report**

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. 567 IAC 22.108 (5)

#### **G6.** Annual Fee

- 1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
- 2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
- 3. The following forms shall be submitted annually by March 31 documenting actual emissions for the previous calendar year.
  - a. Form 1.0 "Facility Identification";
  - b. Form 4.0 "Emissions unit-actual operations and emissions" for each emission unit;
  - c. Form 5.0 "Title V annual emissions summary/fee"; and
  - d. Part 3 "Application certification."
- 4. The fee shall be submitted annually by July 1. The fee shall be submitted with the following forms:
  - a. Form 1.0 "Facility Identification";
  - b. Form 5.0 "Title V annual emissions summary/fee";
  - c. Part 3 "Application certification."
- 5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
- 6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
- 7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
- 8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

## G7. Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

- 1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- 2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- 3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. 567 IAC 22.108 (15)"b"

## **G8.** Duty to Provide Information

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. 567 IAC 22.108 (9)"e"

## **G9.** General Maintenance and Repair Duties

The owner or operator of any air emission source or control equipment shall:

- 1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
- 2. Remedy any cause of excess emissions in an expeditious manner.
- 3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
- 4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. 567 IAC 24.2(1)

## G10. Recordkeeping Requirements for Compliance Monitoring

- 1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:
  - a. The date, place and time of sampling or measurements
  - b. The date the analyses were performed.
  - c. The company or entity that performed the analyses.
  - d. The analytical techniques or methods used.
  - e. The results of such analyses; and
  - f. The operating conditions as existing at the time of sampling or measurement.
  - g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)
- 2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.
- 3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:
  - a. Comply with all terms and conditions of this permit specific to each alternative scenario.
  - b. Maintain a log at the permitted facility of the scenario under which it is operating.

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c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. 567 IAC 22.108(4), 567 IAC 22.108(12)

#### G11. Evidence used in establishing that a violation has or is occurring.

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

- 1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:
  - a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;
  - b. Compliance test methods specified in 567 Chapter 25; or
  - c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.
- 2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a. Any monitoring or testing methods provided in these rules; or
  - b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. 567 IAC 21.5(1)-567 IAC 21.5(2)

# G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. 567 IAC 22.108(6)

#### G13. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 281-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). 567 IAC Chapter 131-State Only

## G14. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. In the case of an electric

utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

- 2. Excess Emissions Reporting
  - a. Oral Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An oral report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable visible emission standard by more than 10 percent opacity. The oral report may be made in person or by telephone and shall include as a minimum the following:
    - i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
    - ii. The estimated quantity of the excess emission.
    - iii. The time and expected duration of the excess emission.
    - iv. The cause of the excess emission.
    - v. The steps being taken to remedy the excess emission.
    - vi. The steps being taken to limit the excess emission in the interim period.
  - b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required oral reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:
    - i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
    - ii. The estimated quantity of the excess emission.
    - iii. The time and duration of the excess emission.
    - iv. The cause of the excess emission.
    - v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
    - vi. The steps that were taken to limit the excess emission.
    - vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. 567 IAC 24.1(1)-567 IAC 24.1(4)
- 3. Emergency Defense for Excess Emissions. For the purposes of this permit, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The facility at the time was being properly operated;
- c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
- d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. 567 IAC 22.108(16)

## **G15. Permit Deviation Reporting Requirements**

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). 567 IAC 22.108(5)"b"

# **G16.** Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. 567 IAC 23.1(2), 567 IAC 23.1(4)

## G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification

- 1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:
  - a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
  - b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
  - c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or as total emissions);
  - d. The changes are not subject to any requirement under Title IV of the Act.
  - e. The changes comply with all applicable requirements.
  - f. For such a change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:
    - i. A brief description of the change within the permitted facility,
    - ii. The date on which the change will occur,
    - iii. Any change in emission as a result of that change,
    - iv. The pollutants emitted subject to the emissions trade

- v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.
- vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and
- vii. Any permit term or condition no longer applicable as a result of the change. 567 IAC 22.110(1)
- 2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. 567 IAC 22.110(2)
- 3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). 567 IAC 22.110(3)
- 4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. 567 IAC 22.110(4)
- 5. Aggregate Insignificant Emissions. The permittee shall not construct, establish or operate any new insignificant activities or modify any existing insignificant activities in such a way that the emissions from these activities no longer meet the criteria of aggregate insignificant emissions. If the aggregate insignificant emissions are expected to be exceeded, the permittee shall submit the appropriate permit modification and receive approval prior to making any change. 567 IAC 22.103(2)
- 6. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. 567 IAC 22.108(11)

## G18. Duty to Modify a Title V Permit

- 1. Administrative Amendment.
  - a. An administrative permit amendment is a permit revision that is required to do any of the following:
    - i. Correct typographical errors
    - ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the source;
    - iii. Require more frequent monitoring or reporting by the permittee; or iv. Allow for a change in ownership or operational control of a source where the
    - director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.
  - b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.
  - c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.

#### 2. Minor Permit Modification.

- a. Minor permit modification procedures may be used only for those permit modifications that do any of the following:
  - i. Do not violate any applicable requirements
  - ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit.
  - iii. Do not require or change a case by case determination of an emission limitation or other standard, or increment analysis.
  - iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act.;
  - v. Are not modifications under any provision of Title I of the Act; and
  - vi. Are not required to be processed as significant modification.
- b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:
  - i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs.
  - ii. The permittee's suggested draft permit
  - iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of a minor permit modification procedures and a request that such procedures be used; and
  - iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).
- c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify. However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, existing permit term terms and conditions it seeks to modify may subject the facility to enforcement action.
- 3. Significant Permit Modification. Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, and those requirements that apply to Title V issuance and renewal. 567 IAC 22.111-567 IAC 22.113 The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in

which event the operation of the changed source may not commence until the department revises the permit. 567 IAC 22.105(1)"a"(4)

## **G19. Duty to Obtain Construction Permits**

Unless exempted under 567 IAC 22.1(2), the permittee must not construct, install, reconstruct, or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, conditional permit, or permit pursuant to 567 IAC 22.8, or permits required pursuant to 567 IAC 22.4 and 567 IAC 22.5. Such permits shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source. 567 IAC 22.1(1) **G20. Asbestos** 

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when conducting any renovation or demolition activities at the facility. 567 IAC 23.1(3)"a", and 567 IAC 23.2

## **G21.** Open Burning

The permittee is prohibited from conducting open burning, except as may be allowed by 567 IAC 23.2. 567 IAC 23.2 except 23.2(3)"h"; 567 IAC 23.2(3)"h" - State Only

## G22. Acid Rain (Title IV) Emissions Allowances

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. 567 IAC 22.108(7)

## G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements

- 1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.
  - b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
  - c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
  - d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.
- 2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
  - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
  - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
  - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
  - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.

- f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
- 3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,
- 5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. 40 CFR part 82

## **G24. Permit Reopenings**

- 1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. 567 IAC 22.108(9)"c"
- 2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.
  - a. Reopening and revision on this ground is <u>not</u> required if the permit has a remaining term of less than three years;
  - b. Reopening and revision on this ground is <u>not</u> required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to June 25, 1993.
  - c. Reopening and revision on this ground is <u>not</u> required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. 567 IAC 22.108(17)"a", 567 IAC 22.108(17)"b"
- 3. A permit shall be reopened and revised under any of the following circumstances:
  - a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to June 25, 1993, provided that the reopening may be stayed pending judicial review of that determination; b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;

- c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement. d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the
- e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. 567 IAC 22.114(1)
- 4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. 567 IAC 22.114(2)

#### G25. Permit Shield

permit.

Compliance with the conditions of this permit shall be deemed compliance with the applicable requirements included in this permit as of the date of permit issuance.

This permit shield shall not alter or affect the following:

- 1. The provisions of section 303 of the Act (emergency orders), including the authority of the administrator under that section;
- 2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- 3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Act;
- 4. The ability of the department or the administrator to obtain information from the facility pursuant to section 114 of the Act. 567 IAC 22.108 (18)

#### **G26.** Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. 567 IAC 22.108 (8)

## **G27. Property Rights**

The permit does not convey any property rights of any sort, or any exclusive privilege. 567 IAC 22.108 (9)"d"

#### G28. Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought to determine transferability of the permit. 567 IAC 22.111 (1)"d"

#### G29. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. 567 IAC 22.3(3)"c"

## G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with an applicable requirement. For the department to consider test results a valid demonstration of compliance with applicable rules or a permit condition, such notice shall be given. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. Unless specifically waived by the department's stack test contact, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. The department may accept a testing protocol in lieu of a pretest meeting. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator Iowa DNR, Air Quality Bureau 7900 Hickman Road, Suite #1 Urbandale, IA 50322 (515) 242-6001

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program. 567 IAC 25.1(7)"a", 567 IAC 25.1(9)

## G31. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons. 567 IAC 26.1(1)

#### **G32.** Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Chief of Air Permits EPA Region 7 Air Permits and Compliance Branch 901 N. 5<sup>th</sup> Street Kansas City, KS 66101 (913) 551-7020 The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau Iowa Department of Natural Resources 7900 Hickman Road, Suite #1 Urbandale, IA 50322 (515) 242-5100

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

## Field Office 1

909 West Main – Suite 4 Manchester, IA 52057 (563) 927-2640

#### Field Office 3

1900 N. Grand Ave. Spencer, IA 51301 (712) 262-4177

## Field Office 5

401 SW 7<sup>th</sup> Street, Suite I Des Moines, IA 50309 (515) 725-0268

## **Polk County Public Health Dept.**

Air Quality Division 5885 NE 14th St. Des Moines, IA 50313 (515) 286-3351

#### Field Office 2

P.O. Box 1443 2300-15th St., SW Mason City, IA 50401 (641) 424-4073

#### Field Office 4

1401 Sunnyside Lane Atlantic, IA 50022 (712) 243-1934

## Field Office 6

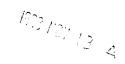
1004 W. Madison Washington, IA 52353 (319) 653-2135

## **Linn County Public Health Dept.**

Air Pollution Control Division 501 13th St., NW Cedar Rapids, IA 52405 (319) 892-6000

## **Appendix A: IDNR Policy 3-b-08 – Opacity Limits**

## IOWA DEPARTMENT OF NATURAL RESOURCES ENVIRONMENTAL PROTECTION DIVISION



#### POLICY/PROCEDURE STATEMENT

**TOPIC: Opacity Limits** 

**Policy Procedure Number:** 3 - b - 08 Replaces Number: None

Date:

Effective Date: November 12, 1998

Preparer: David Phelps

Reviewer:

Bureau Chief: Peter Hamlin Approval:

Date: 11/12/98

Division Administrator: Allan Stokes

Date: /1/12/98

Applicable Code of Iowa or Iowa Administrative Code Rule:

"No person shall allow, cause or permit the emission of visible air contaminants into the atmosphere from any equipment, internal combustion engine, premise fire, open fire or stack, equal to or in excess of 40 percent opacity or that level specified in a construction permit, except as provided below and in 567-Chapter 24."

## REASON OR BACKGROUND

The default opacity limit allowed by regulation is 40%. This limit was established with the original regulations in 1970. It is generally accepted that opacity greater than 40% was evidence of a mass emission standard exceedence. More recently, there have been requests from facilities for limits much lower than that allowed by the regulations, in some cases less than 0.01 gr/scf to which a 40% opacity limit does not correspond. Since opacity is used as an indicator of the particulate emission rate, listing an indicated potential problem opacity that is more in line with the mass emission rate is useful. In order to have the authority to set limits lower than 40%, subrule 23.3(2)d was changed. This change allows the department the ability to set opacity limits at a level that more closely corresponds to what would be observed by the source when operating in compliance with its mass emission rate.

Except in the case where a specific opacity limit is established by rule, it has been the general policy of the Department not to take action on opacity limits directly. Rather, if it is felt that a violation of the mass emission rate exists that is not attributable to some abnormal event, a stack test would be required to verify compliance. However, the Department reserves the right to use the results of formal opacity readings as evidence of an exceedence.

## **DETAILS**

It shall be the policy of the Department to list the default opacity as a permit condition and in addition an indicator opacity may be listed.

For ease of proving continual compliance a source may request a 'no visible emissions' opacity limit which allows proof of compliance without having a certified opacity reading taken. In this case any visible emissions would be an exceedence.

The IDNR permit writer may list an opacity that will be a indicator of possible mass emission rate exceedence. If the permitee wishes, the recommended indicator opacity may be changed by demonstrating compliance with the mass emission rate during a stack test while emitting the new desired indicator opacity. If the tested mass emission rate is less than the permitted emission rate, then the desired indicator opacity may be set at a proportionally higher level than observed during the stack test.

If an opacity measurement, taken in accordance with an approved reference method for opacity, (generally USEPA Method 9 or 22) exceeds the indicator opacity then the facility will promptly investigate the source and make corrections. However, if after corrections are made the opacity continues to exceed the indicator opacity the Department may require additional proof to demonstrate compliance with the mass emissions limits.

## Recommended indicator opacities shall be:

Grain Loading gr./scf	Recommended Indicator Opacity			
<0.01 gr./scf	non specified in permit *			
0.01 to 0.06 gr./scf	10% Opacity			
0.061 to 0.08 gr./scf	20% Opacity			
0.081 to 0.1 gr./scf	25% Opacity			

<sup>\*</sup> A line is added to the permit that states: "If visible emissions are observed other that startup, shut-down, or malfunction, a stack test may be required to demonstrate compliance with the particulate standard."

If a source is a batch process the indicator opacity shall be based on the table above, but the opacity averaging period, for comparison to the indicator opacity, shall be the entire batch cycle. For purposes of comparison to the indicator opacity readings shall be taken during the entire cycle and averaged.

Sources are also given the opportunity to set source specific limits to be coordinated with the initial compliance test. These may then be incorporated into the permit.

In all cases an exceedence of the indicator opacity will require the permitee to file an "indicator opacity exceedence report" to the IDNR regional office. The reporting requirements shall be:

Oral report of excess indicator opacity. An incident of excess indicator opacity (other than an incident of excess indicator opacity during a period of startup, shutdown, or cleaning) shall be reported to the appropriate regional office of the department within eight hours of, or at the start of the first working day following the onset of the of the incident. The reporting exemption for an incident of excess indicator opacity during startup and shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in subrule 25.1(6).

An oral report of excess indicator opacity is not required for a source with operational continuous monitoring equipment (as specified in subrule 25.1(1) if the incident of excess indicator opacity continues for less than 30 minutes and does not exceed the applicable visible emission standard by more than 10 percent opacity.

The oral report may be made in person or by telephone and shall include as a minimum the following:

- a) The identity of the equipment or source operation form which the excess indicator opacity originated and the associated stack or emission point.
- b) The estimated quantity of the excess indicator opacity.
- c) The time and expected duration of the excess indicator opacity.
- d) The cause of the excess indicator opacity.
- e) The steps being taken to remedy the excess indicator opacity.
- f) The steps being taken to limit the excess indicator opacity in the interim period.

Written report of excess indicator opacity. A written report of an incident of excess indicator opacity shall be submitted as a follow-up to all required oral reports to the department within seven (7) days of the onset of the upset condition, and shall include as a minimum the following:

- a) The identity of the equipment or source operation point from which the excess emission originate and the associated stack or emission point.
- b) The estimated quantity of the excess indicator opacity.
- c) The time and duration of the excess indicator opacity.
- d) The cause of the excess indicator opacity.
- e) The steps that were taken to remedy and to prevent the recurrence of the incident of excess indicator opacity.
- f) The steps that were taken to limit the excess indicator opacity.
- g) If the owner claims that the excess indicator opacity was due to malfunction, documentation to support this claim.

## Exceptions to this policy:

- In the case where a facility has an opacity limit established in an existing permit, no change will be made to that permit limit unless the permit is being modified for other purposes.
- 2) If the facility has a continuous opacity monitor, this policy shall not apply.
- This policy shall not apply to opacity limits established in Prevention of Significant Deterioration (PSD) permits or permits that were established for maintenance plans for nonattainment areas.
- 4) This policy shall not apply where an opacity limit is established as an indication of hazardous air pollutants.

5) This policy shall not apply where an opacity limit is established by a rule, New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAPS), etc.

## **Appendix B: Summary of Facility Space Heaters**

#### Summary of Facility Space Heaters Less than 10 MMBtu/hr

	T	Firing Rate		T	Т		T	T
EU No.	Description	(MMBtu/hr)	CO (lb/vr)	NOV (Ib/ur)	SOx (lb/yr)	TSP (lb/yr)	PM10 (lb/yr)	VOC (lb/yr)
C3North-220	Space Heaters	0.90	640	760	4	60	60	· · · · · · · · · · · · · · · · · · ·
C3South-220	Space Heaters	4.95	3500	4160	20	320	320	40
C2South-32	Space Heaters	1.19	840	1020	6	80	80	220 60
C8Dock-35	Space Heaters	1.19	840	1020	6	80	80	
N3-6	Space Heaters	1.19	840	1020	6	80	80	60
PH	Space Heaters	2.06	1460	1740	20	140	140	· 60
R-14	Space Heaters	1.19	840	1020	6	80	<del></del>	100
R-14	Space Heaters	1.19	840	1020	6		80	60
C3North-220	Space Heaters	4.18				80	80	60
N5-7	1	1.19	2960 840	3520	20 6	260	260	200
D8-60	Space Heaters			1020	<u> </u>	80	80	60
	Space Heaters	1.89	1340	1600	10	120	120	80
C9 M4-64	Space Heaters	1.89	1340	1600	10	120	120	80
	Space Heaters	3.05	2160	2560	20	200	200	140
M6-40	Space Heaters	3.05	2160	2560	20	200	200	140
C1-19	Space Heaters	3.05	2160	2560	20	200	200	140
M5-170	Space Heaters	1.50	1060	1260	8	100	100	60
D4-22	Space Heaters	0.73	520	620	4	40	40	40
C5-DH-21	Space Heaters	0.73	520	620	4	40	40	40
E2	Space Heaters	1.50	1060	1260	4	100	100	60
E4-28	Space Heaters	1.50	1060	1260	4	100	100	60
E4-Dock	Space Heaters	4.55	3220	3840	20	300	300	220
E2	Space Heaters	4.55	3220	3840	20	300	300	220
M8	Space Heaters	3.59	2540	3040	20	240	240	160
N4	Space Heaters	1.50	1060	1260	8	100	100	60
N6South-10	Space Heaters	1.50	1060	1260	8	100	100	60
N6North-10	Space Heaters	1.50	1060	1260	8	100	100	60
N7-7	Space Heaters	1.50	1060	1260	20	100	100	60
A4-73	Space Heaters	1.50	1060	1260	8	100	100	60
A3-10	Space Heaters	0.73	520	620	4	40	40	40
C2-30	Space Heaters	1.50	1060	1260	8	100	100	60
C8-240	Space Heaters	3.96	2800	3340	20	260	260	180
C8-30	Space Heaters	1.50	1060	1260	8	100	100	60
<b>C7</b>	Space Heaters	2.74	1940	2320	20	180	180	120
N1-1	Space Heaters	1.50	1060	1260	- 8	100	100	60
C3-DH	Space Heaters	0.73	520	620	4	40	40	40
M2-13	Space Heaters	1.50	1060	1260	8	100	100	60
M2-20A	Space Heaters	1.50	1060	1260	8	100	100	60
L4-90	Space Heaters	2.49	1760	2100	12	160	160	120
L1AL2-68	Space Heaters	0.73	520	620	4	40	40	40
L3East-90	Space Heaters	0.42	300	360	2	20	20	20
L3Center-90	Space Heaters	0.68	480	580	4	40	40	40
L3West-90	Space Heaters	0.93	660	780	4	60	60	40
C5South-27	Space Heaters	1.50	1060	1260	8	100	100	60
C/M	Space Heaters	1.50	1060	1260	8	100	100	60
C/M	Space Heaters	1.50	1060	1260	8	100	100	60
C-LP	Space Heaters	1. <del>5</del> 0	1060	1260	-8	100	100	60
C-DH	Space Heaters	0.73	520	620	4	40	40	40
M6-NW	Space Heaters	1.50	1060	1260	8	100	100	60
M6-SE	Space Heaters	1.50	1060	1260	8	100	100	60
C2-South	Space Heaters	1.50	1060	1260	8	100	100	60

#### Summary of Facility Space Heaters Less than 10 MMBtu/hr

P-11 A1 -		Firing Rate	00 (11 ( )					
EU No.	Description	(MMBtu/hr)	CO (lb/yr)	NOx (lb/yr)	SOx (lb/yr)	TSP (lb/yr)	PM10 (lb/yr)	VOC (lb/yr)
M5Center-170	Space Heaters	1.50	1060	1260	8	100	100	60
C5ES_HV-27	Space Heaters	5.00	3540	4220	26	320	320	240
C5WS_HV-27	Space Heaters	5.00	3540	4220	26	320	320	240
M6WS_HV-40	Space Heaters	4.01	2840	3360	20	260	260	180
M-20B	Space Heaters	0.73	520	620	4	40	40	40
M1-20C	Space Heaters	0.73	520	620	4	40	40	40
E4North-21	Space Heaters	0.73	520	620	4	40	40	40
C4-27	Space Heaters	1.50	1060	1260	8	100	100	60
C6-17	Space Heaters	0.73	520	620	4	40	40	40
C12	Space Heaters	0.73	520	620	4	40	40	40
B-9	Space Heaters	0.73	520	620	4	40	40	40
B2-9	Space Heaters	0.37	260	320	2	20	20	20
W3	Space Heaters	0.73	520	620	4	40	40	40
M8-DH-150	Space Heaters	0.73	520	620	4	40	40	40
TOTAL (lb/yr)		113.7	80460	95900	612	7340	7340	5180